

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

ESTATE OF ELEANOR NORTHINGTON,

Plaintiff,

v.

CITY OF INDIANAPOLIS, LANE COOPER,
ROBERT HALEY, JR., JUSTIN HYDE,
BRUCE JACKSON, AND
RONALD MONDAY,

Defendants.

Case No. 1:21-cv-406-TWP-TAB

AFFIDAVIT OF JUSTIN HYDE

I, Justin Hyde, being duly sworn and under oath, testifies that:

1. I am over the age of eighteen.
2. I am competent to testify about the facts in this affidavit, and it is based on my personal knowledge.
3. I am a patrol officer for the Indianapolis Metropolitan Police Department (“IMPD”) and have been so employed since December 2015.
4. On February 6, 2019, I was working within the course and scope of my employment with the City of Indianapolis when I responded to a call for service at the church where Eleanor Northington was having a mental crisis, disrupting the church service, and physically assaulting people. Through my police radio, I heard that the officers were dealing with a resistor —i.e., someone who is resisting arrest.

5. Officers, including myself, were attempting to conduct an immediate detention of Ms. Northington so she could be taken to the hospital and obtain whatever treatment was recommended by medical professionals.
6. I restrained Ms. Northington's legs because she was kicking, flailing, and neither under control nor subdued even though she was on the ground.
7. I was not charged with any criminal offense for my February 6, 2019 conduct.
8. An internal affairs ("IA") investigation conducted by IMPD also concluded that I did not violate any of IMPD's rules, regulations, or general orders.

FURTHER AFFIANT SAYETH NAUGHT.

AFFIRMATION

I hereby affirm under the penalties of perjury that the foregoing representations are true to the best of my knowledge and belief.

March 25, 2022

Dated

Hyde, Justin A.

Justin Hyde